

# Exhibit M

PEC 1st Request to WAMY USA (12/10/2010)			
Request #	PEC Request	WAMY'S Responses/Objections	Description
3	All documents relating to any investigation, inquiry, review, audit, or analysis conducted by any U.S. state or federal governmental entity, agency and/or department, or any U.S.-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor, any foreign government or any foreign-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor, or by the Kingdom of Saudi Arabia or any Saudi Arabian-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor, which references or addresses any of the WAMY-INTL U.S. and foreign bank accounts (produced in response to Requests #1-2).	Produced	WAMY produced responsive documents. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production.
4	All documents that have been seized by, or produced by WAMY-INTL and/or WAMY-SA to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses any of the WAMYINTL U.S. and foreign bank accounts (produced in response to Requests #1-2).	Produced	Object as overbroad, unduly burdensome, erroneously assumes disputed facts as if established, and does not seek discovery with sufficient particularity. Without waiving objections, <u>WAMY has produced all financial documents in WAMY INTL's possession, including regarding bank accounts.</u> Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production.
5	All documents relating to any investigation, audit, analysis, examination, survey, or review of the WAMY-INTL U.S. and foreign bank accounts (produced in response to Requests #1-2), conducted either by WAMY-INTL, WAMY-SA, or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the Kingdom of Saudi Arabia and/or the Saudi Arabian Monetary Agency ("SAMA")	Produced	Without waiving objections, WAMY has produced all financial documents in WMY INTL's possession, including audits. WAMY produced audits for WAMY INTL. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production.
6	All documents relating to any written or oral communication between or among WAMY-INTL, WAMY-SA, the KSA and/or SAMA, which references or addresses any of the WAMY-INTL U.S. and foreign bank accounts (produced in response to Requests #1-2). Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.	Produced	WAMY has produced all financial documents in WAMY INTL's possession, including bank accounts. WAMY produced documents regarding communication with WAMY SA on bank accounts. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production.
7	All documents relating to the 2004 raid of WAMY INTL's offices in Virginia, or any investigation by any governmental authority relating to WAMY INTL and/or WAMY-SA, including without limitation, the arrest of a WAMY official and/or representative during the 2004 raid.	Produced - all relevant doc	Object as overbroad, unduly burdensome, erroneously assumes disputed facts as if established, responsive documents may be subject to attorney-client work produce privilege, and does not seek discovery with sufficient particularity. Please refer to Exhibit # for WAMY's document production indices.
8	All documents and things that were in your possession and which were seized by the U.S. Government between September 11, 2001 and the present.	Produced - all relevant docs	Object as overbroad, unduly burdensome, erroneously assumes disputed facts as if established, responsive docs may be subject to atty-client work produce privilege, and does not seek discovery with sufficient particularity. Please refer to Exhibit # for WAMY's document production indices.

9	All documents governing, describing, detailing, or otherwise relating to the relationship between WAMY INTL and Abdullah bin Laden and Omar bin Laden. Responsive documents shall include, but are not limited to, their personnel files.	Produced	WAMY produced responsive documents as to Abdullah bin Laden. Omar bin Laden has/had no relationship to WAMY INTL or WAMY SA. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production.
10	All documents relating to Abdullah bin Laden's employment with the Saudi Arabian Embassy in Washington, D.C., including without limitation, all documents detailing, describing, or summarizing any and all positions he held at the Embassy.	Produced	Object as overbroad, unduly burdensome, not reasonably calculated to lead to discovery of admissible evidence, and does not seek discovery with sufficient particularity. WAMY INTL is not in control of documents possessed by Abdullah bin Laden or by KSA Embassy in DC.
11	All documents relating to any written or oral communication involving Abdullah bin Laden, including without limitation: (i) all communications sent to and/or originating from Abdullah bin Laden while in his capacity as an official, employee, or representative of WAMY-INTL and/or WAMY-SA; and (ii) all communications sent to and/or originating from Abdullah bin Laden while in his capacity as an official, employee, or representative of the Saudi Arabian Embassy in Washington, D.C. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.	Produced	WAMY produced responsive documents. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production.
12	All documents relating to all WAMY INTL and/or WAMY-SA banking or financial accounts for which Abdullah bin Laden and/or Omar bin Laden had signatory authority. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY-INTL, WAMY-SA, Abdullah bin Laden and/or Omar bin Laden and the banking or financial institution, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.	Produced	WAMY produced responsive documents regarding bank records during Abdullah bin Laden's tenure. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production.
16	All documents governing, describing, detailing, or otherwise relating to the relationship between WAMY INTL and HAMAS (a/k/a Harakat al Muqawamat al Islamiyyah; a/k/a Islamic Resistance Movement), including without limitation, the following HAMAS-related entities: the Organization for the Care of Orphans, the Islamic Charitable Organization-Hebron, and the Charity Coalition.	Objected to on relevance ground	Object as overbroad, unduly burdensome, not reasonably calculated to lead to discovery of admissible evidence, erroneously assumes disputed facts as if established. PEC's request is irrelevant, as Hamas has nothing to do with the subject matter of litigation. Additionally, PEC's request is vague and ambiguous as to the definition of Hamas-related entities. Without waiving objections, there are no responsive documents.  <u>See also</u> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "

17	All documents WAMY INTL sent to and/or received from HAMAS, including without limitation, any HAMAS-related entities such as: the Organization for the Care of Orphans, the Islamic Charitable Organization-Hebron, and the Charity Coalition. Such documents shall include, but are not limited to, all documents relating to the transfer of funds between WAMY INTL and those entities.	Objected to on relevance ground	Object as overbroad, unduly burdensome, not reasonably calculated to lead to discovery of admissible evidence, erroneously assumes disputed facts as if established. PEC's request is irrelevant as Hamas has nothing to do with the subject matter of litigation. Additionally, PEC's request is vague and ambiguous as to the definition of Hamas-related entities. without waiving objections, there are no responsive documents. <u>See also Judge Daniel's March 28, 2018 decision (DKT # 3946) finding "Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries."</u>
18	All documents relating to any written or oral communication between or among WAMY-INTL, WAMY-SA, the KSA and/or SAMA, which references or addresses HAMAS and/or any HAMAS-related entities, including but not limited to: the Organization for the Care of Orphans, the Islamic Charitable Organization-Hebron, and the Charity Coalition. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.	Objected to on relevance ground	Object as overbroad, unduly burdensome, not reasonably calculated to lead to discovery of admissible evidence, erroneously assumes disputed facts as if established. PEC's request is irrelevant as Hamas has nothing to do with the subject matter of litigation. Additionally, PEC's request is vague and ambiguous as to the definition of Hamas-related entities. without waiving objections, there are no responsive documents. <u>See also Judge Daniel's March 28, 2018 decision (DKT # 3946) finding "Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries."</u>
23	All documents relating to the establishment, duties, obligations, objectives, membership, composition and/or authority of any committees, boards and/or internal bodies of WAMY INTL.	Objected	Object as overbroad, unduly burdensome, not reasonably calculated to lead to discovery of admissible evidence, and does not seek discovery with sufficient particularity.
24	All documents identifying each officer, director, trustee, board member, committee member, employee, and/or volunteer of WAMY INTL. Responsive documents shall include, but are not limited to, their personnel files.	Produced	WAMY produced responsive documents. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production.
25	All documents relating to any and all meetings of officers, directors, trustees, managers, boards, committees, and/or internal bodies of WAMY INTL, including without limitation, any agendas or meeting minutes.	Produced	WAMY produced responsive documents. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production.
28	All documents relating to any audit, analysis, examination, survey, or review of WAMY INTL's bank accounts, investments, assets, capital, and/or financial affairs, conducted either by employees of WAMY INTL, WAMY-SA, or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Responsive documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the Kingdom of Saudi Arabia and/or SAMA.	Produced	WAMY produced responsive documents. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production.
29	All documents identifying projects undertaken or financed by WAMY INTL from the period beginning January 1, 1990 through September 11, 2001.	Produced	WAMY produced responsive documents. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production. WAMY produced documents within the scope of discovery limited to 1992-2002 per Judge Maas's Order.

30	All documents summarizing the funds allocated by WAMY INTL to projects undertaken or financed by WAMY INTL from the period beginning January 1, 1990 through September 11, 2001.	Produced	WAMY produced responsive documents. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production. WAMY produced documents within the scope of discovery limited to 1992-2002 per Judge Maas's Order.
31	All documents relating to any fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY INTL. Responsive documents shall include, but are not limited to, advertisements, promotional materials, invitations to the event, press releases issued in connection with the event, lists of sponsors and attendees, documents identifying the purpose of the fundraiser or conference, materials distributed at the event, written receipts and/or records of the monies collected, written receipts and/or records of how those monies were used and/or distributed, lists of donors, lists of speakers, videos or slides shown at the event, and transcripts, broadcasts, audiotape and/or videotapes of the event.	Produced	WAMY produced responsive documents. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production. WAMY produced documents within the scope of discovery limited to 1992-2002 per Judge Maas's Order.
32	All documents relating to any standards, procedures, protocols, and/or guidelines adopted and followed by WAMY INTL by which charitable contributions are either made to and/or raised by WAMY INTL, how those contributions are collected and accounted for, how it is determined to which charitable designees financial or other forms of support should be distributed, the means by which financial or other forms of support are subsequently disbursed to charitable designees, and the means to ensure that such distributions are being used for charitable purposes.	No responsive documents.	<b>No responsive documents.</b>
33	All documents relating to the involvement of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in determining how funds collected by WAMY INTL should be allocated and/or in the distribution of funds.	No responsive documents.	<b>No responsive documents.</b>
40	All documents relating to the role of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in the fundraising efforts of WAMY INTL.	Produced	WAMY produced responsive documents. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production.
41	All documents relating to any written or oral communications between WAMY INTL and WAMY-SA and/or the KSA regarding anti-terrorism policies, practices or procedures. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.	No responsive documents.	<b>No responsive documents.</b>
52	All documents relating to any meeting between officials or representatives of WAMY INTL and/or WAMY-SA and any official or representative of the Saudi Arabian Embassy and/or the Islamic Affairs Division.	Produced	WAMY produced responsive documents. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production.

54	All documents governing, describing, detailing, or otherwise relating to the relationship between WAMY INTL and each of the Charities identified in Attachment A. In the event that WAMY INTL shared office space with any of the Charities identified in Attachment A, please provide such documents. (Charities in Attachment A are: Al Haramain Islamic Foundation; Al Haramain & Al Masjed Al Aqsa Charity Foundation; BIF; IIRO; MWL; Muwafaq Foundation; Rabita Trust; Saudi High Commission; Saudi Joint Relief Committee for Kosovo and Chechnya; Saudi Red Crescent Society; Third World Relief Agency).	Produced	WAMY produced responsive documents in its possession, custody and control. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production. <i>See also</i> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
55	All documents WAMY INTL sent to, and/or received from the Charities identified in Attachment A, including without limitation, all documents relating to the transfer of funds between WAMY INTL and those Charities.	Produced	WAMY produced responsive documents in its possession, custody and control. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production. <i>See also</i> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
56	All documents relating to any joint fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY-INTL and any of the Charities identified in Attachment A. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.	Produced	WAMY produced responsive documents in its possession, custody and control. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production. <i>See also</i> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
57	All documents relating to any accounts in any banking or financial institution WAMY INTL currently holds, or has held, jointly with or on behalf of the Charities identified in Attachment A, and/or any accounts over which WAMY INTL currently holds or has held signatory authority.	No responsive documents.	<b>No responsive documents.</b> <i>See also</i> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
60	All interviews, statements, or speeches by officials or representatives of WAMY INTL and/or WAMY-SA regarding the conflicts, crises, or conditions facing Muslim communities in Afghanistan, Albania, Algeria, Bosnia & Herzegovina, Chechnya, Egypt, Ethiopia, Europe, Indonesia, Kashmir, Kenya, Kosovo, Malaysia, Pakistan, Palestine, the Philippines, Sudan, Somalia, Tanzania, Turkey, and Yemen.	Objected	Object insofar as many of the named conflicts, crises and conditions have nothing to do with the subject matter of this litigation. WAMY INTL is not in custody of documents possessed by WAMY SA.
71	All documents sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that WAMY INTL and/or WAMY-SA, or any other individual or entity employed by and/or affiliated with WAMY INTL and/or WAMYSA, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities. Responsive documents shall include, but are not limited to, all documents sent to, and/or received from, the Saudi Arabian Embassy in Washington, D.C. and the Islamic Affairs Division of the Embassy.	No responsive documents.	<b>No responsive documents.</b>

**PEC's 1st Request to WAMY SA (12/10/2010)**

Request #	PEC Request	WAMY's Responses/Objections	Description
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6	All documents relating to any investigation, inquiry, review, audit or analysis conducted by any United States state or federal governmental entity, agency and/or department, or any United States-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor, any foreign government or any foreign-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor, or by the Kingdom of Saudi Arabia or any Saudi Arabian-based regulatory body, law enforcement agency, grand jury, bank, financial institution, accountant, or auditor, which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 (U.S. bank accounts, Habib Bank, Emirates Bank, Al Rajhi Bank, foreign bank accounts).	Produced	WAMY produced responsive documents requested to WAMY Int'l. Please refer to <u>Exhibit 1</u> in WAMY's opposition to the motion to compel for WAMY Int'l document production. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
7	All documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 (U.S. bank accounts, Habib Bank, Emirates Bank, Al Rajhi Bank, foreign bank accounts).	Produced	Object as overbroad, unduly burdensome, erroneously assumes disputed facts as if established, and does not seek discovery with sufficient particularity. Without waiving objections, WAMY produced responsive documents relating to its bank accounts. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
8	all documents relating to any investigation, audit, analysis, examination, survey, or review of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 (U.S. bank accounts, Habib Bank, Emirates Bank, Al Rajhi Bank, foreign bank accounts), conducted either by WAMY, or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the KSA and/or the Saudi Arabian Monetary Agency ("SAMA").	Produced	Object as overbroad, unduly burdensome, erroneously assumes disputed facts as if established, and does not seek discovery with sufficient particularity. Without waiving objections, WAMY produced responsive documents related to audits. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
9	All documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses any of the WAMY accounts identified in, and/or in response to, Requests Nos. 1-5 (U.S. bank accounts, Habib Bank, Emirates Bank, Al Rajhi Bank, foreign bank accounts). Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
13	All documents relating to any investigation or inquiries conducted by the Republic of India concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, allegations that WAMY was financing or otherwise supporting Islamic terror groups in the Kashmir region such as Students Islamic Movement of India ("SIMI"), Lashkar-e-Taibah, and Hizbul Mujahideen.	No responsive documents.	<b>No responsive documents.</b> <u>See also Judge Daniel's March 28, 2018 decision (DKT # 3946) finding "Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries."</u>
14	All documents relating to the 2002 arrests of two men attempting to transfer money, given to them by WAMY official Nazir Qureshi, to Kashmiri terrorist groups.	No responsive documents.	<b>No responsive documents.</b>

15	All documents relating to any investigation or inquiries conducted by Romanian authorities concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, the alleged involvement of WAMY in an al Qaida plot to hijack a plane and crash it into London's Heathrow Airport.	No responsive documents.	No responsive documents.
16	All documents relating to any investigation or inquiries conducted by the Russian Federation concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, allegations that WAMY was financing and otherwise supporting Islamic terrorists and separatists in Chechnya.	No responsive documents.	No responsive documents.
17	All documents relating to any investigation or inquiries conducted by the Republic of the Philippines concerning WAMY's alleged support for, or connections to, alleged terrorist or criminal organizations, groups, individuals, or activities, including without limitation, accusations by the Philippines Government that WAMY was financing the Moro Islamic Liberation Front ("MILF") terrorist organization.	No responsive documents.	No responsive documents.
18	All documents relating to any investigation or inquiries conducted by the Federal Republic of Germany concerning Ibrahim El Zayat (formerly the Western European Head of WAMY), including without limitation, any investigation regarding the transfer of money by El Zayat and Ayman Sayed Ahmed Aly on behalf of WAMY to the Albanian branch of Taibah International, an Islamic charity whose Bosnian branch was designated as a Specially Designated Global Terrorist Entity in 2004 by the United States and United Nations.	No responsive documents.	No responsive documents.
19	All documents relating to the 2002 raid of WAMY's offices in Virginia, conducted by U.S. authorities, including without limitation, copies of all documents and things which were seized by U.S. authorities between September 11, 2001 and the present.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
20	All documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders").	No responsive documents.	No responsive documents.
21	All documents WAMY sent to, and/or received from the person and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), including without limitation, all documents relating to the transfer of funds between WAMY and those persons and entities.	No responsive documents.	No responsive documents.
22	All documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons and entities identified in Attachment A ("Kashmir Terror Groups and Leaders"), and/or any accounts over which WAMY holds or has held signatory authority.	No responsive documents.	No responsive documents.



23	All documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the persons identified in Attachment B. For those persons who currently hold, or have held, positions within WAMY, responsive documents shall include, but are not limited to, their personnel files. (Ppl in Attachment B are: Abdullah Bin Laden; Omar Bin Laden; Abdullah Hassan; Adel Batterjee; Ahmed Musa Shahshani; Ahmed Totonji; Ali Bin Shafi Shehri; Anwar Hajjaj; Anwar Ibrahim; Bandar al Ghamedi; Dr. Abd Alwahab Nurulli; Dr. Abdul Hameed Abu Soliman; Dr. Ahmad Abdul Qadir Bahafzallah; Dr. Manih ibn Hammad al Junahi; Dr. Tawfeeq ibn Ahmed al Qusayyer; Fadel Soliman; Hassan Bahafzallah; Ibrahim S. Abdullah; Ibrahim Awaji; Ibrahim El Zayat; Jamal Barzinji; M. Mohamed Mustafa; Mansour Matboli; Mohamed Abbas Afesh; Mohamed Bin Faris; Mohamed Maghazil; Moutaz Saleh Abu Unaig; Nazir Qureshi; Omar Humaidi; Saleh al Wohaibi; Salih bin Hussain Abdelrahman; Samir Moabbir; Taha Jabar Alwani; Tawfiq Qasir; Osama Bin Laden; Ahmed Ajaj; Ali Bapir; Alifuddin Turabi; Amir Khattab; Dr. Al Badr al Hamzi; Khalid al Fawwaz; Khalid Mishal; Sheikh Yousef al Qaradawi; Sulaiman Abdul Aziz al Rajhi)	Produced	WAMY has produced all documents in its possession, custody, and control regarding the people in Attachment B. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
24	All documents WAMY sent to, and/or received from the persons identified in Attachment B, including without limitation, all documents relating to the transfer of funds between WAMY and those persons.	Produced	WAMY has produced all documents in its possession, custody, and control regarding the people in Attachment B. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
25	All documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the persons identified in Attachment B, and/or any accounts over which WAMY holds or has held signatory authority.	Produced	WAMY has produced all documents in its possession, custody, and control regarding the people in Attachment B. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
26	All documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the entities identified in Attachment C. (Orgs in Attachment C are: HAMAS; Al Aqsa Foundation; Organization for the Care of Orphans; Islamic Charitable Organization-Hebron; Charity Coalition; Interpal; Council on American-Islamic Relations; Maktab al Khidmat; Moro Islamic Liberation Front; Muslim Brotherhood; Taliban )	Some objected on relevance grounds, some produced	Objected as irrelevant because these entities have nothing to do with the subject matter of this litigation. See Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> " For non-objected to documents, WAMY has produced all responsive documents in its control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
27	All documents WAMY sent to, and/or received from the entities identified in Attachment C, including without limitation, all documents relating to the transfer of funds between WAMY and those entities.	Some objected on relevance grounds, some produced	Objected as irrelevant because these entities have nothing to do with the subject matter of this litigation. See Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> " For non-objected to documents, WAMY has produced all responsive documents in its control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
28	All documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the entities identified in Attachment C, and/or any accounts over which WAMY holds or has held signatory authority.	Some objected on relevance grounds, some produced	Objected as irrelevant because these entities have nothing to do with the subject matter of this litigation. See Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> " For non-objected to documents, WAMY has produced all responsive documents in its control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.

29	All documents relating to any investigation or inquiry conducted by any United States Investigator, Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
30	All documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
31	All documents relating to any internal investigation or inquiry conducted by WAMY and/or WAMY Personnel which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28. Such documents shall include any investigation or inquiry ordered, conducted, supervised, overseen, or reviewed by the KSA and/or SAMA.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
32	All documents relating to any written or oral communication between WAMY and the KSA and/or SAMA, which references or addresses WAMY's association to, and/or relationship with, the events, persons, or entities identified in Requests Nos. 10-28. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
33	All documents that have been seized by, or produced by WAMY to, any United States Investigator, any Foreign Investigator, or any KSA Investigator, which references or addresses WAMY's alleged support for, or connections to, alleged terrorist organizations, groups, individuals, or activities.	No responsive documents.	<b>No responsive documents.</b>
35	All documents relating to any sanctions imposed upon WAMY and/or WAMY Personnel by the United States, Kingdom of Saudi Arabia, United Nations, or any other nation or international body.	No responsive documents.	<b>No responsive documents.</b>
51	All documents relating to the establishment, duties, obligations, objectives, membership, composition and/or authority of any committees, boards and/or internal bodies of WAMY, including without limitation, the Kashmir Muslim Youth Committee and the Camps and Conference Committee.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
52	All documents identifying each officer, director, trustee, board member, and/or committee member of WAMY (including any subsidiary, affiliate, or branch office).	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
53	All documents relating to any meetings of officers, directors, trustees, managers, boards, committees, and/or internal bodies of WAMY, including without limitation, any agendas or meeting minutes.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.

55	All documents relating to any audit, analysis, examination, survey, or review of WAMY's bank accounts, investments, assets, capital, and/or financial affairs, conducted either by employees of WAMY or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor. Such documents shall include any audit, analysis, examination, survey, or review ordered, conducted, supervised, overseen, or reviewed by the Kingdom of Saudi Arabia and/or SAMA.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
60	All documents relating to the role of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in the fundraising efforts of WAMY's offices outside of Saudi Arabia.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
62	All directives, instructions, and/or communications sent by any officer, director, trustee, board member, committee member, manager, agent, employee, or representative of any WAMY office worldwide to the WAMY offices in the United States.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
65	All documents relating to the involvement of any official, trustee, committee, or board associated with WAMY's headquarters in Saudi Arabia in determining how funds collected by WAMY's branch offices outside of Saudi Arabia should be allocated and/or in the distribution of funds collected by the offices outside of Saudi Arabia.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
66	All documents relating to any written or oral communications between WAMY and the KSA and/or SAMA regarding anti-terrorism policies, practices or procedures. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles or otherwise.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
71	All documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (a/Ida the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
72	All documents WAMY sent to and/or received from the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council for Islamic Affairs; the Ministry of Islamic Affairs, Endowments, Dawa and Guidance; the Ministry of Foreign Affairs, Endowments, Dawa and Guidance; the Ministry of Defense and Aviation, Endowments, Dawa and Guidance; the Majlis al Shura (a/Ida the Shura Council); the Ministry of Education; and any embassy or consulate of the KSA, including the Islamic Affairs Division of the embassy or consulate.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
73	All documents governing, describing, detailing, or otherwise relating to WAMY's role in spreading, propagating, or proselytizing Islam outside of the Kingdom of Saudi Arabia, including without limitation any long term strategy, studies, or papers.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
74	All documents governing, describing, detailing, or otherwise relating to WAMY's role in advancing the foreign policy objectives of the KSA.	No responsive documents.	<b>No responsive documents.</b>

75	All documents relating to all accounts in any United States, Saudi Arabian, or foreign banking or financial institution You currently hold, or have held, jointly with the KSA, any members of the Saudi royal family, or any Saudi official acting on behalf of the KSA ("KSA Joint Bank Accounts"), and/or any KSA Joint Bank Accounts over which You currently hold or have held signatory authority.	No responsive documents.	No responsive documents.
76	All documents relating to the role of the KSA and/or members of the Saudi royal family, in the creation, organization, funding, oversight, supervision, operation, and/or management of WAMY, including any subsidiary, affiliate, and/or branch office.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
77	All documents relating to WAMY's initial capitalization and any subsequent funding provided by the KSA, members of the Saudi royal family, and/or any other individuals or entities.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
78	All documents defining, establishing, or relating to WAMY's privileges, obligations, activities, and/or rights under the laws of the KSA.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
79	All documents relating to any and all laws, statutes, regulations, ordinances, royal decrees, or directives issued by the KSA relating to WAMY, including but not limited to, documents relating to the organization, funding, oversight, supervision, management, and/or control over WAMY's operations, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, determination of which charitable designees should receive support, and/or actual distribution of financial and non-monetary support to charitable designees.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
80	All documents relating to any fundraising events and/or conferences that were held for the benefit of WAMY and were promoted, sponsored, organized, funded, managed, attended, or supervised by the KSA, any member of the Saudi family, and/or any Saudi official acting on behalf of the KSA. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
81	All documents relating to any meeting between officers or representatives of WAMY and any official or agency of the KSA.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
82	All documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and each of the Charities identified in Attachment D. In the event that WAMY, including any subsidiary, affiliate, and/or branch office shared office space with any of the Charities identified in Attachment D, please provide such documents. (Charities in Attachment D are: Al Haramain Islamic Foundation; Al Haramain & Al Masjed Al Aqsa Charity Foundation; BIF; IIRO; MWL; Muwafaq Foundation; Rabita Trust; Saudi High Commission; Saudi Joint Relief Committee for Kosovo and Chechnya; Saudi Red Crescent Society; Third World Relief Agency).	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices. <u>See also Judge Daniel's March 28, 2018 decision (DKT # 3946) finding "Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries."</u>

83	All documents WAMY sent to, and/or received from the Charities identified in Attachment D, including without limitation, all documents relating to the transfer of funds between WAMY and those Charities.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices. <i>See also</i> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
84	All documents relating to any joint fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by WAMY and any of the Charities identified in Attachment D. Responsive documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices. <i>See also</i> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
85	All documents relating to any accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the Charities identified in Attachment D, and/or any accounts over which WAMY currently holds or has held signatory authority.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices. <i>See also</i> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
86	All documents relating to all information or notification WAMY received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, was associated with or involved in: (i) the sponsorship of any radical, extremist, or terrorist organization; (ii) criminal or corrupt activities; or (iii) any military, radical or terrorist activity, plot, or attack.	No responsive documents.	<b>No responsive documents.</b> <i>See also</i> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
87	All documents relating to all information or notification You received prior to September 11, 2001 that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, may have been or was engaging in conduct unrelated to the Charities' ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) or entity(s) was acting within the scope of his employment in relation to any such activities.	No responsive documents.	<b>No responsive documents.</b> <i>See also</i> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
88	All documents sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.	No responsive documents.	<b>No responsive documents.</b> <i>See also</i> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "

89	All documents relating to any disciplinary action taken, or any decision to terminate any relationship with any of the Charities identified in Attachment D, or any individual or entity employed by and/or affiliated with those Charities, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.	No responsive documents.	<b>No responsive documents.</b> <i>See also</i> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
91	All documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the Benevolence International Foundation ("BIF"), including but not limited to, documents relating to shared office space or common employees of WAMY and BIF, including the branch offices of WAMY and BIF.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices. <i>See also</i> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
92	All documents governing, describing, detailing, or otherwise relating to WAMY's and BIF's joint publication and distribution of the book titled <i>Al Ansar al Arab fi Afghanistan</i> ("The Arab Volunteers in Afghanistan").	No responsive documents.	<b>No responsive documents.</b> <i>See also</i> Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
97	All documents relating to any internal investigations conducted by WAMY and/or WAMY Personnel into any alleged criminal, corrupt, or extremist activities of any individual or entity employed by and/or affiliated with WAMY, including without limitation any terrorist or radical religious, political or social activities.	No responsive documents.	<b>No responsive documents.</b>
102	All documents relating to any individual currently detained or incarcerated in Cuba, Afghanistan, or elsewhere in connection with the global war on terrorism, including without limitation, all documents relating to any meetings, interviews, or dialogue WAMY and/or WAMY Personnel have had with individuals held at Guantanamo Bay.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
103	All documents relating to any WAMY Personnel who have been arrested, detained, or incarcerated in connection with the global war on terrorism, including without limitation, any and all employment records for such individuals.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.

**2nd Request - WAMY SA (10/28/2011)**

Request #	PEC Request	WAMY's Responses/Objections	Description
1	All annual, semi-annual, and other periodic financial reports of WAMY (including the branch offices), such as annual reports, balance sheets, financial statements, bank statements, bank account summaries, audits, etc.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 3 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
2	All lists of recipients of aid from the WAMY offices, to include lists which can be generated through any computer or electronic data storage systems.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 3 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.

3	All documents relating to meetings of WAMY's General Secretariat or Board of Trustees, including without limitation, reports submitted by internal and external offices of WAMY, studies and research papers considered during such meetings, records relating to the activities of special committees of WAMY, transcripts or recordings of speeches and discussions during the meetings, resolutions and recommendations of the General Secretariat or Board of Trustees, agendas, etc.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 3 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
4	All annual or periodic reports concerning the objectives and activities of WAMY.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 3 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
5	All reports authored by delegations or groups sent by WAMY to assess conditions and needs in regions outside of Saudi Arabia.	No responsive documents.	<b>No responsive documents.</b>
6	All reports submitted by the field offices of WAMY concerning their operations and finances.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 3 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
7	All summaries of disbursements by WAMY.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 3 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
8	All documents describing the organizational structure of WAMY, to include documents relating to the relationship between the various offices of WAMY.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 3 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
10	All documents relating to the responsibilities of WAMY's Department of Overseas Offices.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 3 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
11	All lists or documents reflecting the identities of persons who were affiliated, as employees or volunteers, with WAMY's operations in Bosnia, the Philippines, Pakistan, Sudan, and/or Kashmir between 1991-2001.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 3 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
12	All documents relating to WAMY's relationship with Mammar Ameer (a/k/a Abu Shakeeb; a/k/a Shakib) (Guantanamo Bay detainee — ISN #939).	No responsive documents.	<b>No responsive documents.</b>
13	All documents relating to WAMY's relationship with Adel Hassan Hamed (a/k/a Adel Hassan; a/k/a Hassan Adel Hussein; a/k/a Abu Dujani; a/k/a Hasan Hamd 'Abd al Muttalib; a/k/a Adel Hassen) (Guantanamo Bay detainee — ISN #940).	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2, 3 and 4</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
15	All documents relating to any meetings between WAMY officials and any officials of the Saudi government concerning religious extremism or terrorism.	No responsive documents.	<b>No responsive documents.</b>
<b>3rd Request - WAMY SA (7/31/2012)</b>			
<b>Request #</b>	<b>PEC Request</b>	<b>WAMY's Responses/Objections</b>	<b>Description</b>



2	All documents governing, describing, detailing, or otherwise relating to any relationship between WAMY and the Third World Relief Agency ("TWRA").	Objection and previously produced	Objects as duplicative of Plaintiffs' 1st document request # 82. Please also refer to <u>Exhibit 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
3	All documents relating to any office space shared between WAMY and the TWRA, including without limitation, the office space located at Prinz-Eugen Street, 36/4/2, Vienna, Austria.	Objection -Duplicative	Object as duplicative of Plaintiffs' 1st document request # 82-89. Please also refer to <u>Exhibit 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
4	All documents WAMY sent to and/or received from the TWRA, including without limitation, all documents relating to the transfer of funds between WAMY and the TWRA.	Objection and previously produced	Objects as duplicative of Plaintiffs' 1st document request # 83. Please also refer to <u>Exhibit 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
5	All documents relating to all accounts in any banking or financial institution WAMY currently holds, or has held, jointly with or on behalf of the TWRA.	Objection-Duplicative	Object as untimely, duplicative of PEC 1st Request # 82-89.
6	All documents governing, describing, detailing, or otherwise relating to the relationships between WAMY and Dr. El Fatih Hassanein and Sukarno Ali Hassanein (collectively "Hassanein Brothers"), including without limitation, all documents relating to all positions the Hassanein Brothers have held or hold within WAMY. Responsive documentation shall include, but are not limited to, copies of their personnel files, resumes, curriculum vitae, biographies, abstracts, media reports, digests, publications, summaries, employment contracts, and/or outlines.	WAMY has produced what it has possession, custody and control. Based on the meet-and-confer, WAMY is robustly searching for any additional documents and if they exist will supplement.	<b>Object as untimely, duplicative of Plaintiffs' 1st document requests # 82-89</b>
7	All documents relating to the Hassanein Brothers' roles in the organization, funding, oversight, supervision, management, and/or control over WAMY's and/or the WAMY-Vienna branch office's operations (or any other WAMY branch office), including without limitation, selection of committee/board members or other officers, internal and external auditing or due diligence, budgeting, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, distribution of financial and non-monetary support from WAMY and/or the WAMY-Vienna branch office to charitable designees, and reconciliation of receipts, payments, and vouchers for any payments or distributions.	Objection - Duplicative. WAMY does not have and never had an office in Vienna, Austria. WAMY does not have documents responsive to this request. However, in good faith as indicated at the meet-and-confer, WAMY is conducting a robust search and will supplement the documents to the extent they exist, related to WAMY operations in Vienna.	<b>Object as untimely, duplicative of Plaintiffs' 1st document requests # 82-89</b>
8	All documents relating to the Hassanein Brothers' supervision, management, control of, or distribution of WAMY's and/or WAMY-Vienna branch office's funds (or any other WAMY branch office), including without limitation, all documents relating to their duties and responsibilities to determine and/or make recommendations as to which charities, humanitarian organizations, individuals, or entities should receive financial and/or nonmonetary support from WAMY and/or the WAMY-Vienna branch office, and the purpose for such disbursements.	Objection - Duplicative. WAMY does not have and never had an office in Vienna, Austria. WAMY does not have documents responsive to this request. However, in good faith as indicated at the meet-and-confer, WAMY is conducting a robust search and will supplement the documents to the extent they exist, related to WAMY operations in Vienna.	<b>Object as untimely, of Plaintiffs' 1st document requests # 82-89</b>



9	All documents relating to the transfer of WAMY funds authorized by either or both of the Hassanein Brothers and/or the WAMY-Vienna branch office (and/or any WAMY official, employee, representative, or agent working on behalf of the Hassanein Brothers or the WAMY-Vienna branch office).	Objection - Duplicative. WAMY does not have and never had an office in Vienna, Austria. WAMY does not have documents responsive to this request. However, in good faith as indicated at the meet-and-confer, WAMY is conducting a robust search and will supplement the documents to the extent they exist, related to WAMY operations in Vienna.	<b>Object as untimely, of Plaintiffs' 1st document requests # 82-89</b>
10	All documents relating to all bank accounts established or held in the name of, on behalf of and/or for the benefit of the WAMY-Vienna branch office, including without limitation, all WAMY accounts over which either or both of the Hassanein Brothers had signatory authority. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY, the Hassanein Brothers, and the bank, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.	Objection - Duplicative. WAMY does not have and never had an office in Vienna, Austria, hence never opened any bank accounts in Austria. WAMY does not have documents responsive to this request.	<b>Object as untimely, of Plaintiffs' 1st document requests # 82-89</b>
11	All documents detailing all contributions received and disbursements made by the WAMY-Vienna branch office, including any outward payment orders, payment or expense vouchers and receipts, letters authorizing payments, cash collection and disbursement summaries, expenditure journals, receipt and disbursement reconciliation reports or summaries, and any audit, review, or analysis of receipts and disbursements.	Produced documents related to funding in Vienna	WAMY has produced all responsive documents within its possession, custody, and control related to projected funded in Vienna. WAMY did not have a chapter in Vienna. Please also refer to <u>Exhibit 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
12	All annual, semi-annual, and other periodic reports submitted by the WAMY-Vienna branch office to WAMY headquarters in Saudi Arabia, such as annual reports, balance sheets, financial statements, bank account summaries, audits, expenditure reports or summaries, receipt and disbursement reconciliation reports or summaries, and cash collection and disbursement reports or summaries.	No responsive documents.	<b>Object as untimely, duplicative of PEC 1st Request # 59, 61, and 63</b> , is harassing, and not calculated to lead to additional discovery of admissible evidence. WAMY has no office in Vienna, Austria. However, projects were completed in Austria. WAMY has produced all responsive documents in its possession, custody, and control regarding these projects. Please refer to Exhibit # for WAMY's document production indices.
13	All reports submitted by the WAMY-Vienna branch office to WAMY headquarters in Saudi Arabia concerning their operations and finances.	No responsive documents.	<b>Object as untimely, duplicative of PEC 1st Request # 59, 61, and 63</b> , is harassing, and not calculated to lead to additional discovery of admissible evidence. WAMY has no office in Vienna, Austria. However, projects were completed in Austria. WAMY has produced all responsive documents in its possession, custody, and control regarding these projects. Please refer to Exhibit # for WAMY's document production indices.
14	All documents relating to the closure of WAMY's branch offices in the cities of Mumbai and Delhi, India, in connection with the Republic of India's investigation concerning the Students Islamic Movement of India ("SIMI") and WAMY's relationship with that group.	No responsive documents.	<b>No responsive documents.</b>

15	All documents relating to the 1999 closure of WAMY's branch office in Chechnya per the orders of the Russian Federation.	No responsive documents.	<b>No responsive documents.</b>
16	All documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and any HAMAS-related entity, including without limitation: Al Islah Charitable Society, Bethlehem Orphan Care Society, Jenin Charity Committee, Jenin Workers Union, and the Union of Good. In the event that any WAMY subsidiary, affiliate, and/or branch office shared office space with Hamas or any Hamas-related entity, please provide such documents.	Objected to on relevancy ground	Objected as irrelevant because these entities have nothing to do with the subject matter of this litigation. See Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
17	All documents WAMY sent to and/or received from any HAMAS- related entity, including without limitation: Al Islah Charitable Society, Bethlehem Orphan Care Society, Jenin Charity Committee, Jenin Workers Union, and the Union of Good. Such documents shall include, but are not limited to, all documents relating to the transfer of funds between WAMY and those entities.	Objected to on relevancy ground	Objected as irrelevant because these entities have nothing to do with the subject matter of this litigation. See Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
18	All documents relating to any written or oral communications between or among WAMY, the Kingdom of Saudi Arabia ("KSA"), and/or the Saudi Arabian Monetary Authority ("SAMA"), which reference or address any HAMAS-related entity, including without limitation: Al Islah Charitable Society, Bethlehem Orphan Care Society, Jenin Charity Committee, Jenin Workers Union, and the Union of Good. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles, or otherwise.	Objected to on relevancy ground	Objected as irrelevant because these entities have nothing to do with the subject matter of this litigation. See Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
19	All documents governing, describing, detailing, or otherwise relating to the appointment of any WAMY officer, director, employee, or representative to the Union of Good's board of trustees, including but not limited to, WAMY Secretary-General Manih ibn Hammad al Juhani, Dr. Salah bin Suliaman al Wahhibi, and Dr. Abd al Wahhab Nurwali.	Objected to on relevancy ground	Objected as irrelevant because these entities have nothing to do with the subject matter of this litigation. See Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "
23	All documents governing, describing, detailing, or otherwise relating to the relationship between WAMY and the entities identified in Attachment B. ( <u>Charities listed in Attachment B are:</u> Ahl-i Hadith, Al Furqan Foundation, Ansar Al Islam, Deeander Anjuman, Eritrean Islamic Jihad, Ittehadul Munzamat al Tulabiyya of Kuwait, Jama'tul Mujahideen Bangladesh, Jamiatul Khairia of Qatar, Muslim United Students Association of Maldives, Rohingya Solidarity Organization, Taibah International, Taibah International - Bosnian Branch	Some objected on relevance grounds, some produced	Objected as irrelevant because these entities have nothing to do with the subject matter of this litigation. See Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> " For non-objected to documents, WAMY has produced all responsive documents in its control. Please also refer to <u>Exhibit 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
24	All documents WAMY sent to, and/or received from the entities identified in Attachment B, including without limitation, all documents relating to the transfer of funds between WAMY and those entities.	Some objected on relevance grounds, some produced	Objected as irrelevant because these entities have nothing to do with the subject matter of this litigation. See Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> " For non-objected to documents, WAMY has produced all responsive documents in its control. Please also refer to <u>Exhibit 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
25	All documents relating to any accounts in any banking or financial institution WAMY currently holds or has held jointly with or on behalf of the entities identified in Attachment B, and/or any accounts over which WAMY holds or has held signatory authority.	No responsive documents.	<b>No responsive documents.</b> See Judge Daniel's March 28, 2018 decision (DKT # 3946) finding " <u>Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries.</u> "

31	All documents referring or relating to the detainment facility at Guantanamo Bay, Cuba and/or any detainee currently or previously incarcerated at that facility.	Produced as to Adel Hamad. No other documents exist.	<b>Object as untimely</b> , duplicative of PEC 1st Request # 102, is harassing, and not calculated to lead to additional discovery of admissible evidence. As to Adel Hamad, WAMY has produced all responsive documents in its possession, custody, and control. Please refer to Exhibit # for WAMY's document production indices.
32	All documents referring or relating to any internal WAMY communications, written or oral, which reference the detainment facility at Guantanamo Bay, Cuba and/or any detainee currently or previously incarcerated at that facility. Responsive documentation shall include, but is not limited to: correspondence, letters, memoranda, reports, notes, emails, facsimiles, or otherwise.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2, 3, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
33	All documents governing, describing, detailing, or otherwise relating to WAMY's application, submitted to the United Nation's Committee on NonGovernmental Organizations ("Committee"), seeking consultative status with the Economic and Social Council ("ECOSOC").	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 1, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
34	All documents relating to any and all concerns expressed by the Committee regarding WAMY's application, including but not limited to: (i) WAMY's links to terrorist activities and investigations concerning same; (ii) on-going legal proceedings against WAMY regarding terrorism links; (iii) WAMY's funding; (iv) WAMY's links w with organizations and affiliates, including WAMY's affiliate in Iraq; and (v) WAMY youth camps. Responsive materials shall include, but are not limited to, Committee meeting minutes, audio or video recordings of Committee meetings, reports, correspondence, letters, memoranda, notes, emails, facsimiles, or otherwise.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
35	All documents relating to WAMY's responses or answers to the concerns expressed by the Committee regarding WAMY's application. Responsive materials shall include, but are not limited to, Committee meeting minutes, audio or video recordings of Committee meetings, reports, correspondence, letters, memoranda, notes, emails, facsimiles, or otherwise.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
36	All documents relating to WAMY's decision to withdraw its application seeking consultative status with the ECOSOC. Responsive materials shall include, but are not limited to, any internal WAMY communications, written or oral, which reference WAMY's application and the decision to withdraw the application.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 1, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
37	All documents governing, describing, detailing, or otherwise relating to the relationship between WAMY headquarters in Saudi Arabia and WAMY's Canada branch office ("WAMY-Canada").	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 1, 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
38	All documents exchanged between WAMY headquarters in Saudi Arabia and WAMY-Canada, including without limitation, all documents relating to the transfer of funds between WAMY headquarters and WAMY-Canada.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 1, 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
39	All annual, semi-annual, and other periodic reports submitted by WAMY-Canada to WAMY headquarters in Saudi Arabia, such as annual reports, balance sheets, financial statements, bank account summaries, audits, expenditure reports or summaries, receipt and disbursement reconciliation reports or summaries, and cash collection and disbursement reports or summaries.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 1, 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
40	All reports submitted by WAMY-Canada to WAMY headquarters in Saudi Arabia concerning their operations and finances.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 1, 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.

41	All documents relating to the provision of funds or other material support from the Saudi Embassy in Canada, and/or any official or agency of the Kingdom of Saudi Arabia, to WAMY-Canada.	No responsive documents.	<b>No responsive documents.</b>
42	All documents governing, describing, detailing, or otherwise relating to the investigation and audit conducted by the Canada Revenue Agency ("CRA") concerning WAMY-Canada and/or WAMY, and the Canadian government's determination to revoke WAMY's designation as a tax exempt registered charity.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 1, 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
43	All documents relating to any written or oral communications between Canadian authorities and WAMY-Canada and/or WAMY regarding the CRA's investigation and audit. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles, or otherwise.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 1, 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
44	All documents that have been seized by, or produced by WAMY-Canada and/or WAMY to, Canadian authorities in relation to the CRA's investigation and audit.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 1, 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
45	All documents governing, describing, detailing, or otherwise relating to WAMY-Canada's and/or WAMY's relationship with the Benevolence International Fund ("BIF-Canada"). Responsive materials shall include, but are not limited to, all documents concerning Mohamed Khatib and any other individual(s) working simultaneously for WAMYCanada and BIF-Canada, shared office space, shared contact information, and shared bank accounts.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 1, 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
46	All documents governing, describing, detailing, or otherwise relating to WAMY-Canada's and/or WAMY's relationship with the Benevolence International Foundation ("BIF-USA").	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to Exhibit 1, 2, 4 and 5 in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices. <u>See Judge Daniel's March 28, 2018 decision (DKT # 3946) finding "Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries."</u>
47	All documents WAMY-Canada or WAMY sent to, and/or received from, BIF-USA, including without limitation, all documents relating to the transfer of funds between WAMY-Canada and/or WAMY and BIF-USA.	No responsive documents.	<b>No responsive documents.</b> <u>See Judge Daniel's March 28, 2018 decision (DKT # 3946) finding "Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries."</u>
48	All documents relating to all accounts at the Bank of Montreal established or held in the name of, on behalf of and/or for the benefit of the WAMY-Canada, WAMY, and/or BIF-Canada. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among WAMY-Canada, WAMY, BIF-Canada, and Bank of Montreal, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to Exhibit 1, 2, 4 and 5 in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices. <u>See Judge Daniel's March 28, 2018 decision (DKT # 3946) finding "Plaintiffs alleged tortious acts of the charities did not proximately cause Plaintiffs' injuries."</u>

49	All documents relating to any written or oral communications between or among WAMY, WAMY-Canada, Dr. Ayman al Taher, Talhah al Jarad, and/or any other WAMY Personnel concerning the CRA's investigation and audit. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles, or otherwise.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 1, 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
50	All documents relating to any written or oral communications between or among WAMY, WAMY-Canada, Dr. Ayman al Taher, Talhah al Jarad, and/or any other WAMY Personnel concerning WAMY's efforts to obtain documentation and other materials in the possession of WAMY-Canada. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, emails, facsimiles, or otherwise.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 1, 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.
51	All documents relating in any way to WAMY meetings, correspondence, statements, or other communications concerning the CRA's investigation and audit.	Produced	WAMY has produced all responsive documents within its possession, custody, and control. Please also refer to <u>Exhibit 1, 2, 4 and 5</u> in WAMY's opposition to the motion to compel for in WAMY's document production and WAMY's document production indices.

**4th Request - WAMY SA (8/22/2013)**

Request #	PEC Request	WAMY's Responses/Objections	Description
1	All documents governing, describing, detailing, or otherwise relating to any relationship between WAMY and Abdullah Omar Naseef and Abdullah al Turki (hereinafter collectively referred to as the "Charity Officials"), including without limitation, all documents relating to all positions the Charity Officials held or hold within WAMY. Responsive documents shall include, but are not limited to, their personnel or employment files.	Objection - Untimely	Objected to as untimely. Please also refer to <u>Exhibit 6</u> in WAMY's opposition to the motion to compel for in WAMY's document production.
2	All documents relating to any notification received by any of the Charity Officials of any alleged involvement of any branch office, official, employee, or representative of WAMY in any criminal, extremist, terrorist, militant, jihadist, or separatist activities.	Objection - Untimely	Objected to as untimely. Please also refer to <u>Exhibit 6</u> in WAMY's opposition to the motion to compel for in WAMY's document production.
3	All documents relating to any involvement or participation of any of the Charity Officials in the review, analysis, investigation, or discussion of any alleged involvement of any branch office, official, employee, or representative of WAMY in any criminal, extremist, terrorist, militant, jihadist, or separatist activities.	Objection - Untimely	Objected to as untimely. Please also refer to <u>Exhibit 6</u> in WAMY's opposition to the motion to compel for in WAMY's document production.
4	All documents relating to any notification received by any of the Charity Officials of any alleged misuse or misappropriation of funds or resources by any branch office, official, employee, or representative of WAMY.	Objection - Untimely	Objected to as untimely. Please also refer to <u>Exhibit 6</u> in WAMY's opposition to the motion to compel for in WAMY's document production.
5	All documents relating to any involvement or participation of any of the Charity Officials in the review, analysis, investigation, or discussion of any alleged misuse or misappropriation of funds or resources by any branch office, official, employee, or representative of WAMY.	Objection - Untimely	Objected to as untimely. Please also refer to <u>Exhibit 6</u> in WAMY's opposition to the motion to compel for in WAMY's document production.
6	All documents relating to any allegation that any of the Charity Officials were involved in any criminal, extremist, terrorist, militant, jihadist, or separatist activities.	Objection - Untimely	Objected to as untimely. Please also refer to <u>Exhibit 6</u> in WAMY's opposition to the motion to compel for in WAMY's document production.

7	All documents relating to any meeting between any of the Charity Officials and any representative of the Saudi government or any foreign government.	Objection - Untimely	Objected to as untimely. Please also refer to <u>Exhibit 6</u> in WAMY's opposition to the motion to compel for in WAMY's document production.
8	All documents relating to any meeting between any of the Charity Officials and any representative of any separatist or independence movement or organization.	Objection - Untimely	Objected to as untimely. Please also refer to <u>Exhibit 6</u> in WAMY's opposition to the motion to compel for in WAMY's document production.